

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

## 841 Chestnut Building Philadelphia, Pennsylvania 19107

MAY 6\_ 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

Robert Brooker, Jr., President Lord Corporation P.O. Box 10038 Erie, PA 16514-0038

Re: Saegertown Industrial Area Site Crawford County, Pennsylvania

Dear Mr. Brooker:

The Environmental Protection Agency (EPA) is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a) and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9604(e), your company is requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), particularly waste oils, waste solvents, waste paint, and any other hazardous substances which were transported to, treated, stored or disposed of at the Saegertown Industrial Area Site located in Crawford County, Pennsylvania.

All information and documents requested are due to the address listed below within fifteen (15) calendar days of receipt of this letter.

The response should include, but not be limited to, information and documentation concerning:

- 1. The nature of your company's manufacturing business during the past fifteen (15) years;
- 2. The types and quantities of wastes generated by your company during the past fifteen (15) years;
- 3. How and where were these wastes disposed of;
- 4. The state (i.e., liquid, solid, or gaseous) of the wastes, and the manner in which these substances are stored or disposed of (i.e., drummed, placed in lagoons, landfilled, placed in piles, etc.);
- 5. Any correspondence with any regulatory agency regarding such substances;
- 6. Description of any permits or applications to any hazardous waste permitting authority;
- 7. Any correspondence with any third party regarding such substances/wastes;
- 8. The identity of, and any documents relating to, any other party who arranged for the transportation, treatment, or disposal of such substances for your company;
- 9. The identity of any other party in the Saegertown Industrial Area (in the vicinity of your facility) who generates any kind of hazardous substances/wastes.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us to the existence of such insurance and provide us with copies of all insurance policies.

The Saegertown Industrial Area covers approximately 100 acres in the Borough of Saegertown, Crawford County, Pennsylvania. This includes property previously owned by the General American Transportation Corporation; property currently owned by the Saegertown Manufacturing Corporation, Spectrum Control, Inc., and Lord Corporation; and properties located in the immediate environs.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts,

maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, disc, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make the information available to the public without further notice to you.

Please send the required information to:

Christine Chulick, Project Manager U.S. Environmental Protection Agency, Region III PA CERCIA Remedial Enforcement Section (3HW12) 841 Chestnut Street Philadelphia, PA 19107

This information collection request is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, 44 U.S.C. §§ 3501 - 3520.

If you have any questions concerning this matter, please contact Ms. Chulick at (215) 597-8188.

Sincerely,

Bruce P. Smith, Chief

Hazardous Waste Enforcement Branch

cc: James P. Snyder, PADER
Sandra Lang, PADER
Alicia Coreley (OWPE)
Joseph Donovan, Esq. (3RC23)
Eugene A. Miller